

INTERNATIONAL UNION OF OPERATING : IN THE MONTGOMERY COUNTY  
ENGINEERS LOCAL 542 : COURT OF COMMON PLEAS

v. :

MALLINCKRODT ARD, INC., formerly :  
known as QUESTCOR : No. 2018-14059  
PHARMACEUTICALS, INC. :

MALINCKRODT PLC :

EXPRESS SCRIPTS HOLDING COMPANY :

EXPRESS SCRIPTS, INC. :  
CURASCRIPT, INC. :

CURASCRIPT SD :

ACCREDITO HEALTH GROUP, INC. :

and :

UNITED BIOSOURCE CORPORATION, now :  
known as UNITED BIOSOURCE LLC., a :  
wholly owned subsidiary of UNITED :  
BIOSOURCE HOLDINGS, INC. :

### ORDER

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2018, upon consideration of the  
Uncontested Motion for Admission *Pro Hac Vice* for G. Patrick Watson, Esquire, of Bryan,  
Cave, Leighton, Paisner, LLP and any response thereto, it is hereby ORDERED AND  
DECREED that the Motion is GRANTED. G. Patrick Watson, Esquire is hereby admitted Pro  
Hac Vice before this Court for purposes of this matter. Mr. Watson shall comply with all  
applicable Rules of Court.

BY THE COURT:

\_\_\_\_\_  
Honorable Gary S. Silow

**MARSHALL, DENNEHEY, WARNER  
COLEMAN & GOGGIN**

BY: DANIEL J. SHERRY, ESQUIRE

Attorney I.D. 21654

620 Freedom Business Center, Suite 300

King of Prussia, PA 19406

Telephone: 610/354-8250 Fax: 610/354-8299

[wibracaglia@mdwgc.com](mailto:wibracaglia@mdwgc.com); [djsherry@mdwgc.com](mailto:djsherry@mdwgc.com)

Attorney for Defendants, Mallinckrodt ARD Inc.  
and Mallinckrodt plc

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**UNCONTESTED MOTION FOR ADMISSION *PRO HAC VICE* OF G. PATRICK  
WATSON, ESQUIRE**

Defendants Mallinckrodt ARD Inc. and Mallinckrodt plc, ("Mallinckrodt Defendants") by  
their undersigned counsel, respectfully move this Honorable Court pursuant to the Pennsylvania

Bar Admission Rule 301 and Pennsylvania Rule of Civil Procedure 1012.1 for the admission *pro hac vice* of G. Patrick Watson, Esquire in this matter and in support thereof aver as follows:

1. Mallinckrodt Defendants seek to have Mr. Watson admitted *pro hac vice* in this matter for the purposes of representing the Mallinckrodt Defendants.

2. Mr. Watson is an attorney with Bryan Cave Leighton Paisner LLP, One Atlantic Center, 14<sup>th</sup> Floor, 1201 W. Peachtree Street, NW, Atlanta, GA 30309-3471, (404-572-6846). (See, Verified Statement of G. Patrick Watson, Esquire attached hereto as Exhibit A, ¶ 1).

3. Mr. Watson is admitted to practice in the State of Georgia (Bar No. 741226, admitted in 1984). Mr. Watson has also been admitted to practice in the State of South Carolina (admitted in 1997) and in the United States Court of Appeals for the First, Fourth, Fifth, Eighth, Ninth, Tenth and Eleventh Circuits. See Exhibit A, ¶ 2.

4. Mr. Watson is a member in good standing of the Bars of the Courts listed in paragraph 3 above. See Exhibit A, ¶ 2.

5. Mr. Watson is not subject to any disciplinary proceedings and is not currently suspended or disbarred in any court. See Exhibit A, ¶ 3.

6. Mr. Watson has not applied for *pro hac vice* admission in any other pending matters in the Commonwealth of Pennsylvania. No motions for his admission have been denied. See Exhibit A, ¶ 4.

7. Mr. Watson is familiar with Pennsylvania Bar Admission Rule 301 and Pennsylvania Rule of Civil Procedure 1012.1 and will be associated with Daniel J. Sherry, Esquire, Marshall Dennehey Warner Coleman & Goggin at all stages of this matter. (See Exhibit A, ¶ 7 and Verified Statement of Daniel J. Sherry, Esquire, attached hereto as Exhibit B).

8. Mr. Sherry is a member in good standing of the Bar of the Commonwealth of Pennsylvania (See Exhibit B, ¶1).

9. Mr. Sherry is and will remain local counsel of record for the Mallinckrodt Defendants (Exhibit B, ¶3).

10. Mr. Sherry recommends Mr. Watson's admission *pro hac vice* and is acting as his sponsor in the above-captioned action. See, Exhibit B, ¶ 2.

11. Mr. Sherry will remain associated with Mr. Watson and shall sign and serve, or be served with, all notices, orders, pleadings or other papers filed in this action and shall attend all proceedings before this Court unless excused by the court. See, Exhibit B, ¶ 4.

12. The fee required by §81.505(a) of the Pennsylvania Interest On Lawyer Trust Account (IOLTA) Board's regulations for *pro hac vice* admissions has been paid and the information required by §81.504 of the Pennsylvania IOLTA Board regulations for *pro hac vice* admissions has been provided to the IOLTA Board. (See, Verification letter dated June 28, 2018 attached hereto as Exhibit C).

13. Plaintiff and co-defendants Defendants Express Scripts Holding Company, Express Scripts, Inc., CuraScript, Inc., Curascript SD, Accredo Health Group, Inc., and United BioSource Corporation, now known as United BioSource LLC, a wholly owned subsidiary of United BioSource Holdings, Inc. do not oppose this Motion. (See, email correspondence from Donald Haviland, Esquire and from Matthew Martino, Esquire attached as Exhibits D and E respectively).

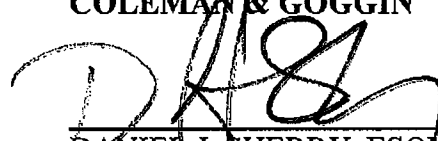
14. No good cause exists to deny this request for *pro hac vice* admission. See, Pennsylvania Bar Admission Rule 301(b)(2) and Pa.R.C.P. 1012.1(e).

WHEREFORE, Defendants Mallinckrodt ARD Inc. and Mallinkrodt plc, respectfully request that this Honorable Court specially admit G. Patrick Watson, Esquire *pro hac vice* on

their behalf in this matter.

Respectfully submitted,

**MARSHALL, DENNEHEY, WARNER,  
COLEMAN & GOGGIN**

A handwritten signature in black ink, appearing to read 'D. Sherry', is written over a horizontal line.

DANIEL J. SHERRY, ESQUIRE  
Attorney for Defendants,  
Mallinckrodt ARD Inc. and  
Mallinckrodt plc

# EXHIBIT "A"

INTERNATIONAL UNION OF OPERATING : IN THE MONTGOMERY COUNTY  
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and :

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wholly owned subsidiary of UNITED :  
BIOSOURCE HOLDINGS, INC. :

**VERIFIED STATEMENT OF G. PATRICK WATSON, ESQUIRE**

I, G. Patrick Watson, Esquire make this statement in support of my request for admission *pro hac vice* to appear in the above-captioned matter on behalf of Mallinckrodt ARD, Inc. and Mallinckrodt plc ("Mallinckrodt Defendants").

1. I am an attorney at law in the State of Georgia with Bryan Cave Leighton Paisner LLP, One Atlantic Center, 14<sup>th</sup> Floor, 1201 W. Peachtree Street, NW, Atlanta, GA 30309-3471, (404-572-68463).

2. I am admitted to practice in the State of Georgia (Bar No. 741226, admitted in 1984). I am also admitted to practice in the State of South Carolina (admitted in 1997) and in the United States Court of Appeals for the First, Fourth, Fifth, Eighth, Ninth, Tenth and Eleventh Circuits.

One Metropolitan Square, 211 North Broadway, Suite 3600, St. Louis, MO 63102-2750, (314-259-2417). I am a member in good standing of the Bars of these Courts.

3. I have never been suspended, disbarred or otherwise disciplined. Nor have I been subject to any disciplinary proceedings.

4. I have not applied for *pro hac vice* admission in any other pending matters in the Commonwealth of Pennsylvania. No Motions for my admission have been denied.

5. I agree to comply with and be bound by the applicable statutes, case law and procedural rules of the Commonwealth of Pennsylvania including the Pennsylvania Rules of Professional Conduct.

6. I further agree to submit to the jurisdiction of the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during my appearance in the above-captioned matter.

7. I am familiar with Pennsylvania Bar Admissions Rule 301 and Pennsylvania Rule of Civil Procedure 1012.1 and attest that I will be associated with Daniel J. Sherry, Esquire at all stages of and for the purposes limited to the above-captioned matter.

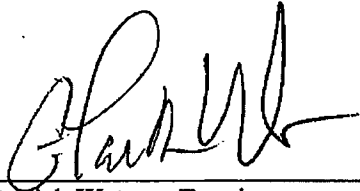
8. I consent to the appointment of the sponsoring attorney Daniel J. Sherry, Esquire as the agent upon whom service of process shall be made for all actions including disciplinary actions that may arise out of the practice of law in the above-captioned matter.

9. I provided all information required by 204 Pa. Code § 81.504 to the Interest On Lawyer Trust Account (IOLTA) Board and paid the \$375.00 fee required by 204 Pa. Code § 81.505(a). See, Letter from IOLTA confirming receipt of the fee.



I make this statement subject to the penalties of 18 Pa. Cons. State. § 4904, which relates to unsworn falsification to authorities.

Dated: July 9, 2018



---

G. Patrick Watson, Esquire  
BRYAN CAVE LEIGHTON PAISNER LLP  
One Atlantic Center, 14<sup>th</sup> Floor  
1201 W. Peachtree Street, NW  
Atlanta, GA 30309-3471  
(404) 572-6846

# EXHIBIT "B"

INTERNATIONAL UNION OF OPERATING : IN THE MONTGOMERY COUNTY  
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and :

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known as UNITED BIOSOURCE LLC., a :  
wholly owned subsidiary of UNITED :  
BIOSOURCE HOLDINGS, INC. :

**VERIFIED STATEMENT OF DANIEL J. SHERRY, ESQUIRE**

I, Daniel J. Sherry, Esquire make this statement in support of the Motion for Admission *Pro Hac Vice* of G. Patrick Watson, Esquire to appear on behalf of Mallinckrodt ARD, Inc. and Mallinckrodt plc ("Mallinckrodt Defendants") in the above-captioned matter pending in the Court of Common Pleas of Montgomery County, Pennsylvania.

1. I am Senior Counsel with Marshall Dennehey Warner Coleman & Goggin, P.C. Suite 300, 620 Freedom Business Center, King of Prussia, PA 19406, (610-354-8260) and a member of good standing of the Bar of the Commonwealth of Pennsylvania, Attorney Identification No. 21654. I am presently local counsel for the Mallinckrodt Defendants in this matter and will remain so throughout the course of this litigation.

2. After reasonable investigation, I believe that G. Patrick Watson, Esquire is a reputable and competent attorney, I recommend this candidate's admission *pro hac vice* in the above captioned matter and I am acting as his sponsor in this case.

3. I have read the verified statement of G. Patrick Watson, Esquire in support of his application and to the best of my knowledge, information and belief the Verified Statement is accurate. See, Verified Statement of G. Patrick Watson, Esquire.

4. I will remain associated with Mr. Watson and shall sign and serve, or be served with, all notices, orders, pleadings or other papers filed in this action and shall attend all proceedings before this Court unless excused by the court.

5. Mr. Watson has provided all information required by 204 Pa. Code § 81.504 to the Interest On Lawyer Trust Account (IOLTA) Board and he has paid the \$375.00 fee required by 204 Pa. Code § 81.505(a). See, Letter from IOLTA confirming receipt of the fee.

6. The proceeds from the settlement of a cause of action in this matter shall be received, held, distributed and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct including the IOLTA provisions thereof, if applicable.

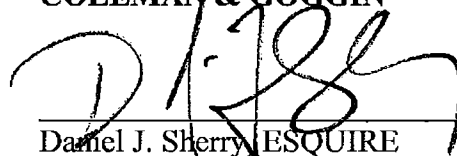
7. Other than Mr. Watson and the three other attorneys from Bryan Cave Leighton Paisner LLP whose Motions for Admission Pro Hac Vice are being filed simultaneously with his Motion, I am not acting as a sponsor for any candidate for admission *pro hac vice* in any case pending before the Courts of the Commonwealth of Pennsylvania

I make this statement subject to the penalties of 18 Pa. Cons. State. § 4904, which relates to unsworn falsification to authorities.

Dated:

7/11/18

**MARSHALL, DENNEHEY, WARNER,  
COLEMAN & GOGGIN**



Daniel J. Sherry, ESQUIRE  
Attorney for Defendants,  
Mallinckrodt ARD Inc. and  
Mallinckrodt plc

# EXHIBIT "C"



SUPREME COURT OF PENNSYLVANIA  
PENNSYLVANIA INTEREST ON  
LAWYERS TRUST ACCOUNT BOARD

June 19, 2018

PATRICK WATSON GEORGE, Esq.  
BRYAN CAVE LEIGHTON PAISNER LLP  
1201 WEST PEACHTREE ST  
14TH FLOOR  
ATLANTA, GA30309

SENT TO GEORGE P. WATSON VIA Email: PATRICK.WATSON@BCLPLAW.COM

Dear Attorney GEORGE:

This letter serves as the fee payment certification referenced in 204 Pa Code §81.503 and acknowledges receipt of the \$375.00 fee paid by Online Payment on this date related to your pursuit for admission *pro hac vice* in the case identified as Local 542 v Mallinckrodt ARD, Inc, no. 2018-14059, filed in Court of Common Pleas of Montgomery County.

You should refer to Pa Rule of Civil Procedure 1012.1, local court rules, and other regulations of 204 Pa Code §81.501 et. seq. concerning additional requirements related to seeking *pro hac vice* admission.

Sincerely,

A handwritten signature in cursive script that reads "Stephanie S. Libhart".

Stephanie S. Libhart  
Executive Director

cc: DANIEL JOSEPH SHERRY, Esq.  
djsherry@mdwccg.com

Pennsylvania Judicial Center  
601 Commonwealth Ave., Ste. 2400  
PO Box 62445, Harrisburg, PA 17106-2445  
717/238-2001 · 888/PA-IOLTA (724-6582) · 717/238-2003 FAX  
paiolta@pacourts.us · www.paiolta.org

Administering Pennsylvania's Interest On Lawyers Trust Account (IOLTA) Program

# EXHIBIT "D"

**From:** Don Haviland [haviland@havilandhughes.com]  
**Sent:** Monday, July 09, 2018 3:58 PM  
**To:** Watson, Patrick; Bill Platt; Martino, Matthew M; Kreiner, Evan R  
(Evan.Kreiner@skadden.com); Menitove, Michael H (Michael.Menitove@skadden.com)  
**Cc:** Johnson, Lindsay Sklar  
**Subject:** RE: Local 542 v. Mallinckrodt, et al.

For you, Pat, of course.

Donald E. Haviland, Jr., Esq.  
Managing Member  
*Haviland Hughes*  
*"We push back"*  
Ambler - Philadelphia  
Atlantic City - Lehigh Valley  
tel: 215-609-4661  
fax: 215-392-4400



---

**From:** Watson, Patrick [mailto:patrick.watson@bcplaw.com]  
**Sent:** Monday, July 9, 2018 3:57 PM  
**To:** Don Haviland; Bill Platt; Martino, Matthew M; Kreiner, Evan R (Evan.Kreiner@skadden.com); Menitove, Michael H (Michael.Menitove@skadden.com)  
**Cc:** Johnson, Lindsay Sklar  
**Subject:** Local 542 v. Mallinckrodt, et al.

All:

We are submitting applications for admission pro hac in the Pennsylvania case for Mallinckrodt's Bryan Cave counsel (Watson, Giorgio, Johnson and Bartz). Can we represent that Plaintiff and Express Scripts do not oppose the request? Thanks, Pat



G. PATRICK WATSON  
Managing Partner — Atlanta  
patrick.watson@bcplaw.com  
T: +1 404 572 6846 F: +1 404 420 0846 M: +1 678 358 8267

BRYAN CAVE LEIGHTON PAISNER LLP  
One Atlantic Center 14th Floor, 1201 W. Peachtree St., N.W., Atlanta, GA 30309-3471  
bcplaw.com



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# EXHIBIT "E"

**From:** Martino, Matthew M [Matthew.Martino@skadden.com]  
**Sent:** Monday, July 09, 2018 3:58 PM  
**To:** Watson, Patrick; Don Haviland (havidand@havidandhughes.com); Bill Platt (platt@havidandhughes.com); Kreiner, Evan R; Menitove, Michael H  
**Cc:** Johnson, Lindsay Sklar  
**Subject:** RE: [Ext] Local 542 v. Mallinckrodt, et al.

Yes, you may. Express Scripts does not oppose. Thanks.

---

**From:** Watson, Patrick [mailto:patrick.watson@bcdplaw.com]  
**Sent:** Monday, July 09, 2018 3:57 PM  
**To:** Don Haviland (havidand@havidandhughes.com); Bill Platt (platt@havidandhughes.com); Martino, Matthew M (NYC); Kreiner, Evan R (NYC); Menitove, Michael H (NYC)  
**Cc:** Johnson, Lindsay Sklar  
**Subject:** [Ext] Local 542 v. Mallinckrodt, et al.

All:

We are submitting applications for admission pro hac in the Pennsylvania case for Mallinckrodt's Bryan Cave counsel (Watson, Giorgio, Johnson and Bartz). Can we represent that Plaintiff and Express Scripts do not oppose the request? Thanks, Pat



G. PATRICK WATSON  
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Further information about the firm, a list of the Partners and their professional qualifications will be provided upon request.

Case# 2018-14059-29 Docketed at Montgomery County Prothonotary on 07/13/2018 11:27 AM, Fee = \$0.00. The filer certifies that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.